

**From:** [Dylan Schaffer](#)  
**To:** [Daniel Balmat](#)  
**Cc:** [Edward Kerley](#); [Matt Batezel](#)  
**Subject:** RE: Tong v. State Farm  
**Date:** Wednesday, September 25, 2024 2:40:28 PM  
**Attachments:** [image001.png](#)

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I'll save you the time and withdraw the subpoena, without prejudice to reserving it.

Regards,

**Dylan Schaffer**  
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**From:** Daniel Balmat <[dbalmat@plawp.com](mailto:dbalmat@plawp.com)>  
**Sent:** Wednesday, September 25, 2024 2:30 PM  
**To:** Dylan Schaffer <[dylan@kslaw.us](mailto:dylan@kslaw.us)>  
**Cc:** Edward Kerley <[edward@kslaw.us](mailto:edward@kslaw.us)>; Matt Batezel <[MBatezel@plawp.com](mailto:MBatezel@plawp.com)>  
**Subject:** Tong v. State Farm

Counsel, this follows on a voicemail I just left.

Per Local Rules 7-19 and 7-19.1 and Judge Rocconi's Procedures and Standing Order, this is to advise you that State Farm intends to apply *ex parte* tomorrow for an order quashing or modifying the subpoena to Sander Dawson and/or entering the protective order proposed by State Farm. Please let us know if you will oppose the application.

Sincerely,

Daniel T. Balmat

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**PACIFIC LAW**  
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